



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Vermont Organic Farmers, LLC
Est. Number:	N/A
Physical Address:	39 Bridge Street, Richmond, VT 05477
Mailing Address:	PO Box 697, 39 Bridge Street, Richmond VT 05477
Contact & Title:	Nicole Dehne, Certification Administrator
E-mail Address:	nicdehne@hotmail.com
Phone Number:	804-434-4122
Auditor(s):	David J. Hildreth
Program:	USDA National Organic Program (NOP)
Audit Date(s):	May 21 - August 3, 2007
Audit Identifier:	NP7141ACA
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliance.
Audit Criteria:	7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000, updated September 11, 2006
Audit Scope:	Vermont Organic Farmers' quality manual including personnel, processes procedures, facilities, and related records.
Location(s) Audited:	Vermont Organic Farmers office in Richmond, VT; Butternut Mountain Farm in Morrisville, VT; Otter Creek Brewing in Middlebury, VT; and Journeys Hop Farm in Bridport, VT.

Vermont Organic Farmers, LLC (VOF) became an accredited certifying agent to the USDA National Organic Program (NOP) on September 24, 2002, for crops, wild crops, livestock, and handler/processor. VOF currently has 192 crops, 50 livestock, 39 wild crops, and 241 processor/handler operations.

The 5 Year Accreditation Audit process started on May 21, 2007, with a review of the documents submitted by VOF and concluded with the on-site surveillance audit which was conducted on July 30 – August 3, 2007.

All staff, contract inspectors, and certification board members are qualified for the duties assigned. All VOF staff, contract inspectors and review committee members had current conflict of interest, resumes, confidentiality agreements, evaluations, and training records. VOF has followed all correct procedures for denial of certification and suspension of certification. One client had used a prohibited substance and



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refused to discontinue use and another client was suspended for not paying fees.

The audit included observations of three witness audits conducted by contract inspectors of VOF. One inspection was a mock inspection of a wild crop operation (Maple Syrup), and the other inspections were a processor (Organic Brewery) and a livestock and field crops. Both inspectors were very knowledgeable and thorough.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that VOF is currently operating in compliance to the requirements of the audit criteria except as noted below. The corrective actions for three non-compliances from the annual updates were reviewed and found to be implemented and effective; therefore, the non-compliances were cleared. A new non-compliance was identified during the audit.

NP6340ACA.NC1 – Major - Cleared - 205.510 (a)(1) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees: A complete and accurate update of information submitted pursuant to §§205.503 and 205.504.” *VOF submitted the annual updates for 2004 and 2005 at the same time the 2006 annual update was submitted.* **Corrective Action:** A new Certification Administrator was hired and a procedure has been instituted to ensure the annual report will be submitted before the due date.

NP6340ACA.NC2 – Minor - Cleared - §205.504 (3)(ii) states, “A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for: each person to be designated by the applicant to review or evaluate applications for certification.” *Resumes or descriptions of experience, training, and education for Anne Lazor and Tim Sanford were not submitted with the annual update.* **Corrective Action:** The resumes for Anne Lazor and Tim Stafford were included in their personnel files and were reviewed.

NP6340ACA.NC3 – Minor - Cleared - §205.504 (c)(2) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents... for all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent, a conflict of interest disclosure report...” *Conflicts of interest disclosure reports for Peter Young (Executive Committee Member), Laini Fondiller, Anne Lazor, and Tim Sanford, (VOF Review Committee) were not submitted with the annual update.* **Corrective Action:** Current conflicts of interest disclosure forms for all review committee members were reviewed during the on-site audit.



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NP7141ACA.NC1 – NOP §205.662 (a) states, “Notification. When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program’s governing State official reveals any noncompliance with the Act or regulations in this part, a written notification shall provide:”

- “(3) The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.” *The Certifying Agent is issuing non-compliances with a reply date; however, little follow up is done to ensure a reply is received from the clients by the Certifying Agent. Several files reviewed showed letters/notification of non-compliance with a thirty or sixty day reply and no response from the certified clients.*
- “(b) Resolution, when a certified operation demonstrates that each noncompliance has been resolved, the certifying agent or State organic program’s governing State official, as applicable, shall send the certified operation a written notification of noncompliance resolution.” *The Certifying Agent is receiving adequate corrective actions from some clients; however, the Certifying Agent is not issuing written notification of non-compliance resolution.*